

**Final**  
**Clean Air Act General Conformity Determination**  
**for the Cadiz Groundwater Storage and Dry-Year Supply Program**

Project Description. The Metropolitan Water District of Southern California (Metropolitan) and the Department of the Interior Bureau of Land Management (BLM) are jointly evaluating the implementation of a groundwater storage and dry-year supply project to enhance water resource management of Metropolitan's water supplies through a cost-effective groundwater storage and water transfer program. Metropolitan proposes to withdraw water from the Colorado River Aqueduct (CRA) for storage in an underground aquifer for later withdrawal. During dry years, Metropolitan may pump the stored water and additional indigenous groundwater and transport it to the Metropolitan service area. The proposed Cadiz Project facilities consist of spreading basins, water conveyance and power distribution facilities between the CRA and the spreading basins, a pumping plant to pump water from the CRA through the conveyance pipeline to the project spreading basins, and a project wellfield to extract water from the groundwater aquifer system and pump it back to the CRA. The proposed water conveyance and power distribution facilities would be located on federal lands administered by BLM. Additionally, the proposed groundwater operations would be governed by a groundwater monitoring and management plan with oversight and enforcement by BLM.

Regulatory Framework. The project is located in the eastern Mojave Desert of San Bernardino County and includes land administered by the BLM. A portion of this region has been designated as moderate non-attainment for federal ambient air quality standards for PM-10. An air quality conformity determination is required for federal actions that may contribute emissions in non-attainment areas to ensure that the federal action does not contribute to delays in achieving attainment with the federal ambient air quality standards. Construction of the project would cause PM-10 emissions that exceed the level for which a conformity determination is required, and a conformity determination has been prepared.

The draft conformity analysis and determination was prepared and circulated for agency and public review in accordance with the federal regulations implementing the Clean Air Act (40 CFR 93) and Rule 2002, General Federal Actions Conformity, adopted by the Mojave Desert Air Quality Management District (MDAQMD) pursuant to 40 CFR 51 Subpart W, incorporated into the State Implementation Plan by the California Air Resources Board and approved by the United States Environmental Protection Agency (USEPA). Rule 2002 provides the procedures for determining conformity for general federal actions within MDAQMD's jurisdiction.

Notice of the 30-day comment period on the draft conformity analysis and determination was published in the San Bernardino Sun on June 19, 2001, and in the Needles Desert Star on June 20, 2001. The draft conformity analysis and determination was also provided to specified federal, State, and local agencies for 30-day comment which concluded on July 20, 2001. Comment was received from the Southern California Association of Governments (SCAG) that indicated that the federal action is consistent with the Regional Comprehensive Plan and Guide air quality chapter core policy. SCAG also noted that BLM's conformity analysis provides that emission levels would be controlled by implementation of corrective measures and recommended that feasible mitigation measures be implemented and monitored. The proposed federal action includes the corrective measures noted by SCAG in its comment.

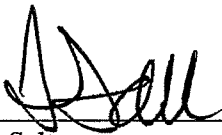
Air Quality Conformity Analysis. On July 31, 1995, the MDAQMD adopted a PM-10 attainment plan for a sub-part of the district-wide non-attainment area, known as the Mojave Desert Planning Area (MDPA). The USEPA has indicated that the PM-10 attainment plan is not approvable in its present form for a variety of reasons. This means that there is no USEPA-approved attainment plan for the area including the Cadiz Project. However, provisions are included in MDAQMD Rule 2002 to determine conformity to an applicable State Implementation Plan (SIP) that does not contain an attainment or maintenance demonstration plan approved by USEPA since 1990.

Section 2002(H)(1)(d)(ii) allows for the use of a numeric emissions inventory calculation as an area-wide air quality modeling analysis to demonstrate conformity, pursuant to 2002(H)(1)(e)(iv), in the absence of a USEPA-approved attainment or maintenance plan. The MDAQMD has determined that an area-wide air quality modeling analysis is appropriate for the project, given the relatively remote location of the proposed project and the nature of the activity primarily generating emissions (short-term construction activity employing all feasible control measures). Therefore, the numeric emissions inventory calculation was used for the conformity analysis.

This calculation compares projected total PM-10 emissions in the nonattainment area without the project during the years the project construction will occur, plus total direct and indirect emissions from the project, to a "future baseline" inventory. The "future baseline" emissions used for this comparison are the emissions calculated using 1990 activity levels with emission factors appropriate for the future years. In particular, the "future baseline" emissions account for reductions from the implementation of control measures after 1990. Conformity is demonstrated if the projected future emissions without the project plus the direct and indirect emissions from the project are below the "future baseline" emissions.

Comparison of the projected emissions with the project during 2002, which is the year when construction emissions will be highest, with the "future baseline emissions" indicated that projected PM-10 will be below the "future baseline" emissions by 15,139 tons/year.

Determination. It has been determined that the federal action positively conforms to the applicable SIP for the Mojave Desert Air Basin. The BLM is supporting an activity that has been demonstrated by USEPA and MDAQMD standards not to cause or contribute to new violations of any national ambient air quality standards in the affected area, nor increase the frequency or severity of an existing violation. Implementation of the federal action will not delay timely attainment of the PM-10 standards in the Mojave Desert Air Basin, nor any required interim emission reductions or other milestones. This conclusion of a positive conformity determination for the federal action planned for the Cadiz Groundwater Storage and Dry-Year Supply Program fulfills the BLM's obligation and responsibility under 40 CFR 93 and MDAQMD Rule 2002 and 40 CFR 51, Subpart W.



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9-13-01

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Date